

January 28, 2009

Ms. Kathrina M. Donegan
Air Pollution Control Program
St. Louis County Health
111 South Meramec Avenue
Clayton, Missouri 63105

REC'D
JAN 30 2009
APCO

**Re: Semi-Annual NSPS, NESHAP and Monitoring Reports
Bridgeton Landfill, LLC, 189-0312**

Dear Ms. Donegan:

On behalf of Bridgeton Landfill, LLC, enclosed are the Semi-Annual Report for the Title V Operating Permit (OP2001009), the Semi-Annual Report in accordance with New Source Performance Standards for Municipal Solid Waste Landfills 40 CFR 60 Subpart WWW (NSPS) and the Semi-Annual Report Startup, Shutdown and Malfunction (SSM) Plan per National Emissions Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills, being 40 CFR Part 63 Subpart AAAA (NESHAP). The enclosed reports serve as the 2008 Title V Semi-Annual Report, the Semi-Annual NSPS Report and the SSM Report for the period July 1, 2008 through December 31, 2008.

I certify based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate and complete.

If you have any questions, please contact James Martin at (812) 240-1939 or Lina Klein of Aquaterra Environmental Solutions at (573) 442-6391.

Sincerely,
REPUBLIC SERVICES



Tim Trost
Area President

C: Mr. Bob Randolph, MDNR-APCP
Ms. Patricia Scott, EPA Region VII
James Martin, Area Environmental Manager, Bridgeton Landfill, LLC
Rick Walker, Site Manager, Bridgeton Landfill, LLC

January 28, 2009

Ms. Kathrina M. Donegan
Air Pollution Control Program
St. Louis County Health
111 South Meramec Avenue
Clayton, Missouri 63105

**Re: Semi-Annual Startup, Shutdown and Malfunction (SSM) Report
2008 Semi-Annual Report
Bridgeton Landfill, LLC 189-0312
Air Operating Permit Number OP2001009
Reporting Period: July 1, 2008 through December 31, 2008**

Dear Ms. Donegan:

The Bridgeton Landfill, LLC is subject to the National Emissions Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills, being 40 CFR Part 63 Subparts A and AAAA (NESHAP). The NESHAP requires a facility to prepare and implement a start-up, shutdown and malfunction (SSM) Plan. The SSM Plan includes the procedures for operating and maintaining affected landfill gas (LFG) collection and control equipment as well as continuous control device monitoring equipment during start-up, shutdown and malfunction events. The Bridgeton Landfill, LLC is an existing source and implemented the SSM Plan on January 16, 2003.

In accordance with 40 CFR §63.10(d)(5), a semi-annual report must be submitted to the regulatory authority within 30 days of the completion of the calendar half. The report shall contain information pertaining to the facility's compliance with the procedures in their SSM Plan during SSM events. This letter serves as the Semi-Annual SSM Report for the reporting period July 1, 2008 through December 31, 2008.

During the period of July 1, 2008 through December 31, 2008 the Bridgeton Landfill documented thirty-five (35) SSM events in accordance with the Startup, Shutdown and Malfunction Plan developed for the facility and to comply with 40 CFR 63 Subpart AAAA. During this compliance period no deviations from the SSM Plan were recorded, therefore no revisions to the SSM Plan have been required.

For the reporting period, seventeen (17) start-up and five (5) shutdown events occurred. The actions taken at the facility for all SSM events during the reporting period July 1, 2008 through December 31, 2008 were consistent with the procedures listed in the SSM Plan at the facility. Records of SSM events are maintained at the facility and available for review.

**Bridgeton Landfill, LLC
Semi-Annual Startup, Shutdown and Malfunction (SSM) Report
2008 Semi-Annual Report: July 1, 2008 through December 31, 2008
January 28, 2009**

Please note, many of the shutdown and start-up events were the result of switching from enclosed flare #1 to enclosed flare #2.

During the reporting period, thirteen (13) malfunction events occurred, of which none caused an applicable limitation to be exceeded. Table 1 contains the date, duration and description of all malfunction events for the reporting period.

Attached is certification by the Responsible Official. If you have any questions regarding this Semi-Annual SSM Report, please contact me at (573) 442-6391.

Sincerely,

Aquaterra Environmental Solutions, Inc.



Lina Klein, P.E.
Project Manager


FOR

Michele A. Boussad
Senior Project Manager

Attachment: Table 1 - Description of Malfunction Events

c: Mr. Bob Randolph, MDNR-APCP
Ms. Patricia Scott, EPA Region VII
James Martin, Republic Services
Niki Wuestenberg, Republic Services
Rick Walker, Bridgeton Landfill, LLC

Table 1: Malfunction Events
Bridgeton Landfill, LLC
Reporting Period July 1, 2008 through December 31, 2008

Date	Duration (hrs:min:sec)	Description of Malfunction (Include actions taken to correct a malfunction)	Equipment Affected	Were SSM Plan Procedures Followed?	Emission Limit Exceeded or Potentially Exceeded?*
7/1/2008 23:23	10:01:00	overvoltage at VFD	control device	Yes	No
7/2/2008 12:32	71:28:00	continous chart recorder not operational	continuous monitoring system	Yes	No
7/10/2008 6:23	0:57:00	overvoltage at VFD	control device	Yes	No
7/11/2008 3:36	3:19:00	overvoltage at VFD	control device	Yes	No
7/11/2008 7:45	1:58:00	overvoltage at VFD	control device	Yes	No
7/15/2008 0:18	6:05:00	overvoltage at VFD	control device	Yes	No
8/4/2008 14:40	1:15:00	Auto block valve failure	control device	Yes	No
8/14/2008 22:04	0:42:00	Autodialer callout	control device	Yes	No
8/23/08 22:11	36:07:00	Overvoltage due to electric spike	control device	Yes	No
8/25/08 16:53	15:00:00	Overvoltage	control device	Yes	No
8/26/08 9:47	1:07:00	Overvoltage on VFD	control device	Yes	No
8/30/08 15:17	64:47:00	VFD	control device	Yes	No
12/30/08 22:36	1:46:00	power failure - high winds	control device	Yes	No

*If the malfunction event caused or may have caused an emission limit to be exceeded (i.e., raw LFG released to the air), enter YES



MISSOURI DEPARTMENT OF NATURAL RESOURCES
AIR POLLUTION CONTROL PROGRAM
COMPLIANCE CERTIFICATION AND MONITORING REPORT
PART 70 OPERATING PERMIT

PART 1 - INSTALLATION INFORMATION AND CERTIFICATION

FIPS NO.	189	PLANT NO.	0312
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INSTALLATION NAME
BRIDGETON LANDFILL, LLC

INSTALLATION LOCATION (STREET ADDRESS AND CITY)
13570 ST. CHARLES ROCK ROAD, BRIDGETON, MO 63044

OPERATING PERMIT NUMBER OP2001009 (RENEWAL APPLICATION SUBMITTED 8/6/04)	DATE OPERATING PERMIT ISSUED 2/7/01
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TYPE OF REPORT

☒ ANNUAL COMPLIANCE CERTIFICATION ☐ SEMI-ANNUAL MONITORING REPORT ☐ EXCEEDANCE REPORT

IF ANNUAL COMPLIANCE CERTIFICATION, IS THE ANNUAL COMPLIANCE CERTIFICATION BEING SUBMITTED TO ALSO FULFILL THE REPORTING REQUIREMENTS FOR THE SEMI-ANNUAL MONITORING REPORT?

☒ YES ☐ NO

REPORTING PERIOD START DATE 01/01/08	REPORTING PERIOD END DATE 12/31/08
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	RESPONSIBLE OFFICIAL	PERMIT CONTACT PERSON
Name	TIM TROST	JAMES MARTIN
Title	AREA PRESIDENT	AREA ENVIRONMENTAL MANAGER
Mailing Address	13570 ST. CHARLES ROCK ROAD, BRIDGETON, MO 63044	13570 ST. CHARLES ROCK ROAD, BRIDGETON, MO 63044
Telephone Number	(314)739-5099	(812) 240-1939

HAS THE ABOVE INFORMATION CHANGED SINCE THE ISSUANCE OF THE OPERATING PERMIT?

☒ YES ☐ NO

I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate and complete.*

SIGNATURE OF RESPONSIBLE OFFICIAL 	DATE SIGNED 01-28-09
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PRINT NAME OF RESPONSIBLE OFFICIAL
TIM TROST

*This certification means that the signatory has verified compliance with all applicable regulations and operating permit conditions, and that the installation has complied with all monitoring, record keeping, reporting and testing conditions specified in the operating permit unless specified differently in a deviations report. For information concerning administrative and civil penalties, please consult Section 643.085 of the Revised Statutes of the State of Missouri (RSMo) and Section 643.151 RSMo, respectively.



MISSOURI DEPARTMENT OF NATURAL RESOURCES
AIR POLLUTION CONTROL PROGRAM
COMPLIANCE CERTIFICATION AND MONITORING REPORT
PART 70 OPERATING PERMIT

PART 2

FIPS NO.

189

PLANT NO.

0312

INSTALLATION NAME

BRIDGETON LANDFILL, LLC

REPORTING PERIOD

01/01/08-12/31/08

1. PLANT-WIDE PERMIT CONDITIONS

DID THE INSTALLATION EXPERIENCE ANY DEVIATIONS DURING THE REPORTING PERIOD FROM THE PLANT-WIDE PERMIT CONDITIONS?

☒ YES ☐ NO

2. EMISSION UNIT PERMIT CONDITIONS

DID THE INSTALLATION EXPERIENCE ANY DEVIATIONS DURING THE REPORTING PERIOD FROM THE EMISSION UNIT PERMIT CONDITIONS?

☐ YES ☒ NO

3. CORE PERMIT REQUIREMENTS

DID THE INSTALLATION EXPERIENCE ANY DEVIATIONS DURING THE REPORTING PERIOD FROM THE CORE PERMIT REQUIREMENTS?

☐ YES ☒ NO

4. GENERAL PERMIT REQUIREMENTS

DID THE INSTALLATION EXPERIENCE ANY DEVIATIONS DURING THE REPORTING PERIOD FROM THE GENERAL PERMIT REQUIREMENTS?

☒ YES ☐ NO

NOTE: If you checked "Yes" in any of the four deviation questions above, and the installation has not previously reported the deviations, the installation must complete Part 3 of the Compliance Certification and Monitoring Report Form.



MISSOURI DEPARTMENT OF NATURAL RESOURCES
AIR POLLUTION CONTROL PROGRAM
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PART 70 OPERATING PERMIT

PART 3 - DEVIATIONS FROM REQUIRED MONITORING

FIPS NO. 189			PLANT NO. 0312		INSTALLATION NAME BRIDGETON LANDFILL, LLC			
REPORT PERIOD START DATE 1/1/08			REPORT PERIOD END DATE 12/31/08					
PERMIT CONDITION	POLLUTANT	MONITORED LEVEL	MONITORING METHOD	DEVIATION DESCRIPTION	DEVIATION DATE	DEVIATION DURATION	CAUSE OF DEVIATION	CORRECTIVE ACTION
SEE ENCLOSED NSPS & MACT REPORTS								
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Operation & Maintenance Plan	Flares down during testing period.	4/11/2008	1.12 hours	Control Device Not Operational	The enclosed flare was non-operational from approximately 10:33 to 11:40 on 4/11/08 while conducting testing. Flare #2 was manually started approximately 1 hour later.
PW006 - Monitoring Condition 3	NMOC	N/A	Continuous Monitoring System	Landfill gas flow and temperature not recorded	5/12/2008	5.87 hours	Continuous Monitoring System Recorder Not Operational	The circle chart recorders were disconnected while installing variable frequency drives and digital chart recorders. Recording resumed approximately 5.87 hours later.
PW006 - Monitoring Condition 3	NMOC	N/A	Continuous Monitoring System	Landfill gas flow and temperature not recorded	5/16/2008	9.25 hours	Continuous Monitoring System Recorder Not Operational	The circle chart recorders were disconnected while installing variable frequency drives and digital chart recorders. Recording resumed approximately 5.87 hours later.
PW006 - Monitoring Condition 3	NMOC	N/A	Continuous Monitoring System	Landfill gas flow and temperature not recorded	5/19/2008	4 hours	Continuous Monitoring System Recorder Not Operational	The circle chart recorders were disconnected while installing variable frequency drives and digital chart recorders. Recording resumed approximately 5.87 hours later.



MISSOURI DEPARTMENT OF NATURAL RESOURCES
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PART 3 - DEVIATIONS FROM REQUIRED MONITORING

FIPS NO. 189			PLANT NO. 0312		INSTALLATION NAME BRIDGETON LANDFILL, LLC			
REPORT PERIOD START DATE 1/1/08			REPORT PERIOD END DATE 12/31/08					
PERMIT CONDITION	POLLUTANT	MONITORED LEVEL	MONITORING METHOD	DEVIATION DESCRIPTION	DEVIATION DATE	DEVIATION DURATION	CAUSE OF DEVIATION	CORRECTIVE ACTION
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	1/9/2008	9.5 hours	Low Temperature	The continuous chart recorder indicated that flare #2 operated at a temperature below the compliance temperature during portions of the first two quarters of 2008. The issue was resolved at the beginning of April, and the flare has operated at temperatures above the compliant temperature since that time.
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	1/11/2008	5.75 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	1/11/2008	14.5 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	1/13/2008	84 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	1/17/2008	25.5 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	1/18/2008	235.75 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	1/29/2008	54.25 hours	Low Temperature	



MISSOURI DEPARTMENT OF NATURAL RESOURCES
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PART 3 - DEVIATIONS FROM REQUIRED MONITORING								
FIPS NO. 189			PLANT NO. 0312		INSTALLATION NAME BRIDGETON LANDFILL, LLC			
REPORT PERIOD START DATE 1/1/08				REPORT PERIOD END DATE 12/31/08				
PERMIT CONDITION	POLLUTANT	MONITORED LEVEL	MONITORING METHOD	DEVIATION DESCRIPTION	DEVIATION DATE	DEVIATION DURATION	CAUSE OF DEVIATION	CORRECTIVE ACTION
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	2/1/2008	30.5 hours	Low Temperature	The continous chart recorder indicated that flare #2 operated at a temperature below the compliance temperature during portions of the first two quarters of 2008. The issue was resolved at the beginning of April, and the flare has operated at temperatures above the compliant temperature since that time.
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	2/2/2008	18.5 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	2/5/2008	5 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	2/6/2008	22.75 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	2/8/2008	7.5 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	2/8/2008	10.5 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	2/9/2008	116 hours	Low Temperature	



MISSOURI DEPARTMENT OF NATURAL RESOURCES
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FIPS NO. 189			PLANT NO. 0312		INSTALLATION NAME BRIDGETON LANDFILL, LLC			
REPORT PERIOD START DATE 1/1//08			REPORT PERIOD END DATE 12/31/08					
PERMIT CONDITION	POLLUTANT	MONITORED LEVEL	MONITORING METHOD	DEVIATION DESCRIPTION	DEVIATION DATE	DEVIATION DURATION	CAUSE OF DEVIATION	CORRECTIVE ACTION
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	2/14/2008	4 hours	Low Temperature	The continous chart recorder indicated that flare #2 operated at a temperature below the compliance temperature during portions of the first two quarters of 2008. The issue was resolved at the beginning of April, and the flare has operated at temperatures above the compliant temperature since that time.
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	2/17/2008	189.25 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	2/25/2008	379.75 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	3/12/2008	9.75 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	3/14/2008	357.5 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	4/1/2008	15.75 hours	Low Temperature	
PW006 - Reporting Condition 1	NMOC	N/A	Operation & Maintenance Plan	Failure to Submit required Exceedance reports	1/1/08-6/30/08	N/A	incidents of high O2, high temp, positive pressure	Deviations from monitored parameters were provided to SLCDOH 7/21/08



MISSOURI DEPARTMENT OF NATURAL RESOURCES
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PART 3 - DEVIATIONS FROM REQUIRED MONITORING

FIPS NO. 189			PLANT NO. 0312	INSTALLATION NAME BRIDGETON LANDFILL, LLC				
REPORT PERIOD START DATE 1/1/08			REPORT PERIOD END DATE 12/31/08					
PERMIT CONDITION	POLLUTANT	MONITORED LEVEL	MONITORING METHOD	DEVIATION DESCRIPTION	DEVIATION DATE	DEVIATION DURATION	CAUSE OF DEVIATION	CORRECTIVE ACTION
PW006 - Recordkeeping	NMOC	N/A	Operation & Maintenance Plan	Failure to keep up-to-date, readily available onsite records of control equipment compliance monitoring	3/1/08-5/31/08	N/A	Technician on site was unaware of the location of the hard copy of the data	Wellhead data for months of March and April provided to SLCDOH 7/1/08. The appropriate personnel were informed of where to locate all data.
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Operation & Maintenance Plan	Flare #1 shutdown	7/1/2008	10 hours	Control Device Not Operational	The enclosed flare was non-operational from approximately 11:23 PM on 7/1/08 to 9:24 AM on 7/2/08 due to overvoltage on the variable frequency drive. The flare was manually restarted at 9:24 AM on 7/2/08.
PW006 - Monitoring Condition 3	NMOC	N/A	Continuous Monitoring System	Landfill gas flow and temperature not recorded	7/2/2008	72 hours	Continuous Monitoring System Recorder Not Operational	Maintenance was performed on electronic chart recorder for flare #1 during the period spanning from approximately 12:32 PM on 7/2/08 to 12:00 PM on 7/5/08.



MISSOURI DEPARTMENT OF NATURAL RESOURCES
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PART 4

FIPS NO. 189	PLANT NO. 0312
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INSTALLATION NAME
BRIDGETON LANDFILL, LLC

REPORTING PERIOD
01/01/08 - 12/31/08

WERE THERE ANY OTHER MONITORING DEVIATION (EXCESS EMISSION) REPORTS SUBMITTED TO THE MISSOURI DEPARTMENT OF NATURAL RESOURCES- AIR POLLUTION CONTROL PROGRAM DURING THIS REPORTING PERIOD?

☒ YES ☐ NO (IF YES, SUBMIT A COPY OF THE REPORT OR COMPLETE THE DEVIATION REPORT SUMMARY BELOW)

PERMIT CONDITION	REPORTING REQUIREMENT	DATE REPORT SUBMITTED TO THE DEPARTMENT
SEE ATTACHED NSPS AND MACT REPORTS		
PW006 Reporting Condition 7	Submit NSPS semiannual report of records; report includes deviations from 10 CSR 10-5.490	7/30/08 (Reporting period 1/1/08 - 6/30/08) 1/31/09 (Reporting period 7/1/08 - 12/31/08)
	Submit SSM events in accordance with site's SSM Plan; report includes SSM events	7/30/08 (Reporting period 1/1/08 - 6/30/08) 1/31/09 (Reporting period 7/1/08 - 12/31/08)
General Permit Condition 1.(II)(A)(1)	Submit Title V Semi Annual Report	7/30/08 (Reporting period 1/1/08-6/30/08) 1/31/09 (Reporting period 7/1/08 - 12/31/08)
General Permit Condition 1.(V)(II)(D)		Exceedance Reports for the following reporting periods: Reporting period 11/12/07 - 1/4/08; Reporting period 6/6/08; Reporting period 3/11/08 - 3/12/08; Reporting period 3/26/08; Reporting period 5/11/08 - 5/12/08; Reporting period 5/25/08 - 5/30/08; Reporting period 6/30/08; Reporting period 7/25/08 - 7/28/08; Reporting period 8/4/08 - 8/6/08; Reporting period 8/14/08; Reporting period 8/21/08 - 8/26/08; Reporting period 8/26/08; Reporting period 8/30/08 - 9/2/08; Reporting period 9/3/08 - 9/4/08; Reporting period 9/15/08 - 9/16/08; Reporting period 9/18/08; Reporting period 10/1/08 - 10/6/08; Reporting period 10/16/08 - 10/20/08; Reporting period 11/13/08 - 11/14/08;



MISSOURI DEPARTMENT OF NATURAL RESOURCES
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PART 4

FIPS NO. **189** PLANT NO. **0312**

INSTALLATION NAME
BRIDGETON LANDFILL, LLC

REPORTING PERIOD
01/01/08 - 12/31/08

WERE THERE ANY OTHER MONITORING DEVIATION (EXCESS EMISSION) REPORTS SUBMITTED TO THE MISSOURI DEPARTMENT OF NATURAL RESOURCES- AIR POLLUTION CONTROL PROGRAM DURING THIS REPORTING PERIOD?

☒ YES ☐ NO (IF YES, SUBMIT A COPY OF THE REPORT OR COMPLETE THE DEVIATION REPORT SUMMARY BELOW)

PERMIT CONDITION	REPORTING REQUIREMENT	DATE REPORT SUBMITTED TO THE DEPARTMENT
General Permit Condition 1.(V)(II)(D)		Reporting period 11/13/08 - 12/2/08; Reporting period 11/20/08 - 11/21/08; Reporting period 11/25/08 - 11/26/08; Reporting period 12/8/08 - 12/10/08; Reporting period 12/23/08 - 12/26/08; Reporting period 12/30/08 - 12/31/08.